

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

SHIRE FREE CHURCH MONADNOCK,)	
IAN FREEMAN,)	
)	
Plaintiffs,)	
)	
v.)	No. 1:22-CV-100-SM
)	
SCOTT BAILEY, in his official capacity)	
as Special Agent of the Federal Bureau)	
of Investigation,)	
)	
Defendant.)	
)	

JOINT MOTION TO STAY

On January 24, 2023, this Court granted Plaintiffs' Assented-to Motion to Stay this matter and ordered the case stayed for 60 days. Since that time, the United States obtained a warrant to search the personal property that is the subject of this litigation. The FBI has conducted an initial cursory search of each of the items but needs additional time to search the items in more detail to determine if they contain contraband or if they can be returned to Plaintiffs. For this reason, the parties request that this Court stay this matter for an additional 30 days to allow the FBI additional time to search the remaining devices.

Respectfully submitted,

Shire Free Church Monadnock,
Ian Freeman

By: /s/ Jared Bedrick
Jared Bedrick, NH Bar No. 20438
CHAMPIONS LAW
170 West Rd., Suite 6D
Portsmouth, NH 03801
(603) 436-8100
jared@champions.law

JANE E. YOUNG
United States Attorney

By: /s/ Michael McCormack
Michael McCormack
Assistant U.S. Attorney, NH Bar No. 16470
U.S. Attorney's Office
53 Pleasant St.
Concord, NH 03301
(603) 225-1552
Michael.mccormack2@usdoj.gov

Dated: April 6, 2023

Dated: April 6, 2023